

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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TAMIKO GARRIS-RIVERS,

Index No. 13-cv-9034(GBD)(RLE)

Plaintiff,

-against-

**DECLARATION IN  
OPPOSITION**

THE METROPOLITAN TRANSPORTATION  
AUTHORITY, THE METROPOLITAN  
TRANSPORTATION AUTHORITY POLICE  
DEPARTMENT, THE LONG ISLAND RAIL ROAD,  
MTAPD POLICE OFFICER ELOISE BRODERICK,  
MTAPD POLICE OFFICER GREG BUEHLER, MTAPD  
POLICE OFFICER CHRIS McDERMOTT, MTAPD  
POLICE OFFICER JOUAN OLIVARES, MTAPD  
POLICE OFFICER ROBERT RAU, MTAPD POLICE  
OFFICER MATTHEW REILLY, MTAPD POLICE  
OFFICER MICHAEL HAGGERTY, MTAPD POLICE  
OFFICER SHEK, MTAPD POLICE OFFICER "JOHN  
DOE" ALSO KNOWN AS POLICE OFFICER "WILLETT",  
LIRR EMPLOYEE BENJAMIN GARDNER, and  
LIRR EMPLOYEE JOHN MANCINI,

Defendants.

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S I R S :

ANDREW K. PRESTON, an attorney admitted to practice in the United States District Court for the Southern District of New York, declares, pursuant to 28 U.S.C. §1746, under penalty of perjury, as follows:

1. The undersigned is employed as an associate attorney in the law firm Bee Ready Fishbein Hatter & Donovan, and represents Defendants in the above-captioned action.
2. This Declaration and accompanying memorandum of law are submitted in opposition to the Plaintiff's motion *in limine*. (DE:107).

3. As set forth in the accompanying Memorandum of Law, Defendants respectfully submit that an order denying Plaintiff's motion *in limine* is warranted.

Dated: Mineola, New York  
June 15, 2016

Respectfully yours,  
**BEE READY FISHBEIN  
HATTER & DONOVAN, LLP**

By: /S/  
Andrew K. Preston (AP-5857)  
*Attorneys for Defendants*  
170 Old Country Road, Ste. 200  
Mineola, New York 11501  
T. 516-746-5599 – F. 516-746-1045  
File No.: 6178-1307

**TO: STECKLOW COHEN & THOMPSON**  
By: **DAVID A. THOMPSON (DT 3991)**  
*Attorneys for Plaintiff*  
10 Spring Street, Suite 1  
New York, New York 10012  
T. 212-566-8000 – F. 212-202-4952